Remarks

Status of the Application

Applicants respectfully request reconsideration of the rejections set forth in the Office Action mailed on March 20, 2003.

- The Examiner has rejected claims 1-2, 8, 10-13, and 15 under 35 U.S.C. 102 (e) as being anticipated by U.S. Patent No. 5,991,173 to *Unger* et al. (*Unger*).
- The Examiner has rejected claims 9, 16-17, and 20-21 under 35 U.S.C. 103 (a) as being unpatentable over *Unger*.
- The Examiner has rejected claim 7 under 35 U.S.C. 103 (a) as being unpatentable over *Unger* in view of U.S. Patent No. 6,163,811 to *Porter* (*Porter*).
- The Examiner has rejected claims 3-6, 18, and 19 under 35 U.S.C. 103 (a) as being unpatentable over *Unger* in view of U.S. Patent No. 6,005,503 to *Burrows* (*Burrows*).
- The Examiner has rejected claim 14 under 35 U.S.C. 103 (a) as being unpatentable over *Unger* in view of Klein S.T., Bookstein A., Deerwester S., "Storing Text Retrieval Systems on CD-ROM: Compression and Encryption Considerations," July 1989, ACM Trans. *On Information Systems* 7, pp. 230-45 (*Klein*).

Please cancel claims 2 and 17. Claims 1, 3-16, and 18-21 are pending in the current application.

The Claims

Objections

The Examiner has objected to informalities in Claim 20. Applicants have amended claim 20 accordingly for clarity in the claims. Applicants respectfully submit that this amendment does not change the scope of claim 20 as previously written and request the objection be removed.

Rejections Under 35 U.S.C. § 102

The Examiner has rejected claims 1-2, 8, 10-13, and 15 under 35 U.S.C. 102 (e) as being anticipated by *Unger*. *Unger* discloses "[a] method for compressing text includ[ing] steps of parsing words from text in an input file and comparing the passed words to a predetermined dictionary" (Abstract). The predetermined dictionary in *Unger* has a plurality of vocabulary word with corresponding numbers or tokens (*see* Abstract). A supplemental dictionary accounts for vocabulary words not present in the predetermined dictionary (*see id.*). After the parsed words are replaced by the numbers or tokens, the dictionaries and numbers or tokens are stored in the compressed file (*see id.*).

Claim 1

Claim 1 has been amended to include the limitations of dependent claim 2. In particular, claim 1 now explicitly requires "wherein the portion of the compiler information being compressed by said compressing includes program symbol names." Support for this amendment can be found in the Specification at p. 2, ll. 6-14. As such, the Examiner's comments with respect to claim 2 are now addressed.

The Examiner has asserted that *Unger* discloses that the compiler information being compressed includes symbol names. Applicants respectfully disagree. *Unger's* method of compression compares the words (including *numeric strings, decimal points, currency symbols*, etc.) to a predetermined dictionary, and then to a supplemental dictionary if the words are not found in the previous (*see* col. 10, ll. 23-39). Numeric characters can be encoded with a special predetermined "numeric" dictionary (*see id.*). As such, the symbols described in *Unger* are merely characters in a text file that have no function or meaning outside of the context of the text file being compressed. In contrast, the present claim requires compressing "program symbol names." As found in the Specification at p. 2,

> Source programs typically use a sequence of tokens to name program symbols. The portion 102 illustrated in FIG. 1 declares three program symbols, a "namespace", an "int" variable, and a "long" variable. The "namespace" is a container, and has the two variables as its members. Typically, programs use short context-dependent names for these symbols.

Thus, program symbol names are not simply characters in a text file as taught by *Unger*, but are more correctly characterized as programming references or pointers with meaning outside of the contextual of a text file as taught by *Unger*.

Applicants, therefore, respectfully submit that claim 1 is patentable for at least the reasons stated above and request the rejection of claim 1 be withdrawn.

Claim 10

Claim 10 has been amended to explicitly require, "program symbol names," which is essentially the same limitation as required by amended claim 1. Therefore, Applicants respectfully submit that claim 10 is patentable over the cited art for at least the reasons stated for claim 1 above and request that the rejection of claim 10 be withdrawn.

Furthermore, *Unger* teaches the use of dictionaries with a "plurality of vocabulary word in it and number (or token) corresponding to each vocabulary word" (col. 9, ll. 6-8). Applicants submit that *Unger* does not teach or reasonably suggest, "*generating* uncompressed program symbol names" as required by the present claim.

Applicants, therefore, respectfully submit that claim 10 is patentable for at least the reasons stated above and request the rejection of claim 10 be withdrawn.

Claim 13

Claim 13 has been amended to explicitly require, "an enhanced compiler suitable for generation of enhanced compiler products, wherein the enhanced compiler compiles a source program having at least one compressed program symbol name..." which is essentially the same limitation as required by amended claim 1. Therefore, Applicants respectfully submit that claim 13 is patentable over the cited art for at least the reasons stated for claim 1 above and request that the rejection of claim 13 be withdrawn.

Furthermore, as cited by the Examiner at col. 1, l. 47 to col. 2, l. 39, *Unger* discloses a method of compressing text. *Unger* specifically teaches that, "most of the text manipulated by distributed information systems in, in fact, written in natural languages..." (col. 2, ll. 25-27). As such, Applicants respectfully submit that *Unger* does not teach the compilation of a *source program* to produced enhanced compiler products as required by the present claim.

Applicants, therefore, respectfully submit that claim 13 is patentable for at least the reasons stated above and request the rejection of claim 13 be withdrawn.

Claims 8, 11-12, and 15

Claims 8, 11-12, and 15 depend either directly or indirectly from independent claims 1, 10, and 13 and are therefore also allowable over the cited art for at least the reasons stated for claims 1, 10, and 13 above.

Furthermore, claims 8 and 15 have been amended to explicitly remove "a source browser information file" and "browser information" limitations respectively in order to more clearly

distinguish the present invention from the cited art and are, therefore, also believed allowable over the cited art for at least these reasons.

Rejections Under 35 U.S.C. § 103

The Examiner has rejected claims 9, 16-17, and 20-21 under 35 U.S.C. 103 (a) as being unpatentable over *Unger*. Applicants respectfully disagree. As discussed above and as currently amended, Applicants submit that *Unger* does not teach the compression of "program symbol names" as required by the present claims.

Claim 9

Claim 9 depends directly from independent claim 1 and is therefore also allowable over the cited art for at least the reasons stated for claim 1.

Furthermore, Applicants have amended claim 9 to explicitly require that "the compressed compiler related product contains debugger information." Support for this amendment may be found in the Specification at p. 10, ll. 15-30. Although Applicants concede that debugging is well known in the art, a particular compressed compiler related product that contains particular debugger information (i.e. information that provides a list of names for member of a class) that has been compressed in a particular way as taught by the present claim is not reasonably taught or suggested by *Unger*.

Therefore, Applicants respectfully submit that claim 9 is patentable for at least the reasons stated above and request the rejection of claim 9 be withdrawn.

Claims 16, and 20

Claim 16 is a computer-readable medium claim with substantially the same claim limitations as recited in claim 1 and is therefore believed patentable over the cited art for the at least the same reasons as claim 1 above.

Claim 20 depends directly from independent claim 16 and is therefore also allowable over the cited art for at least the reasons stated for claim 16.

Furthermore, claim 20 has been amended to explicitly remove the "browser information" limitation in order to more clearly distinguish the present invention from the cited art and is believed, therefore, allowable over the cited art for at least these reasons.

The Examiner has rejected claim 7 under 35 U.S.C. 103 (a) as being unpatentable over *Unger* in view of *Porter*.

Claim 7

Claim 7 depends from claim 1 and is therefore patentable over the cited art for at least the reasons stated above for claim 1. Furthermore, *Porter* does not cure the deficiency in *Unger* namely that *Porter* does not teach program symbol names in the context of the present claims.

Therefore, Applicants respectfully submit that claim 7 is patentable for at least the reasons stated above and request the rejection of claim 7 be withdrawn.

The Examiner has rejected claims 3-6, 18, and 19 under 35 U.S.C. 103 (a) as being unpatentable over *Unger* in view of *Burrows*.

Claim 3

Claim 3 depends directly on claim 1 and is therefore patentable over the cited art for at least the reasons stated above for claim 1. *Burrows* does not cure the deficiency of *Unger* with respect to the reasons stated above for claim 1.

Furthermore, claim 3 explicitly requires, "a differential encoding scheme." The Examiner has asserted that the delta values, as taught by *Burrows*, are analogous to the differential encoding scheme as required by the present claim. Applicants respectfully disagree.

Delta encoding as taught by *Burrows* is "a way to compress an *ordered* sequence of *integers*" (col. 1, ll. 16-18) (*emphasis* added). The present claim requires compression of "a plurality of the program symbol names," which neither is ordered, nor is integers as taught by *Burrows*. Therefore, *Burrows* in combination with *Unger* does not teach or reasonably suggest the elements of the present claim. Further, Applicants respectfully submit that applying *Burrows* to the present claim by analogy, as suggested by the Examiner, results in an improper rejection based on hindsight.

Therefore, Applicants respectfully submit that claim 3 is patentable for at least the reasons stated above and request the rejection of claim 3 be withdrawn.

Claims 4-6

Applicants respectfully submit that claims 4-6 depend indirectly from independent claim 1 and are therefore also allowable over the cited art for at least the reasons stated for claim 1.

Claims 18-19

Claims 18-19 are computer readable medium claims of claims 3-4 respectively and contain substantially all the limitations of those claims. Therefore, Applicants respectfully submit that claims 18-19 are patentable for at least the reasons stated above for claims 3-4 and request that the rejection of claims 18-19 be withdrawn.

The Examiner has rejected claim 14 under 35 U.S.C. 103 (a) as being unpatentable over *Unger* in view of *Klein*.

Claim 14

Claim 14 depends directly from amended claim 13 and is patentable over the Examiner's primary reference (*Unger*) for at least the same reasons as stated above for claim 13. *Klein*, which teaches compression considerations does not cure the deficiencies of *Unger*.

Therefore, Applicants respectfully submit that claim 14 is patentable for at least the reasons stated above and request the rejection of claim 14 be withdrawn.

Applicants believe that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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